

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

1 Raymond A. Cardozo (SBN 173263)
email: rcardozo@reedsmith.com
2 Ashley L. Shively (SBN 264912)
email: ashively@reedsmith.com
3 REED SMITH LLP
4 101 Second Street, Suite 1800
San Francisco, CA 94105-3659
5 Telephone: +1 415 543 8700
6 Facsimile: +1 415 391 8269

7 Peter J. Kennedy (SBN 166606)
Email: pkennedy@reedsmith.com
8 REED SMITH LLP
9 355 South Grand Avenue, Suite 2900
Los Angeles, CA 90071-1514
10 Telephone: +1 213 457 8000
Facsimile: +1 213 457 8080

11 Attorneys for Defendant
12 Wells Fargo Bank, N.A.

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

15 LATASHA McLAUGHLIN, on behalf
16 of herself and all others similarly
17 situated,

18 Plaintiff,

19 vs.
20

21 WELLS FARGO BANK, N.A., d/b/a
22 WELLS FARGO HOME MORTGAGE,

23 Defendant.
24

Case No.: 3:15-cv-02904-WHA

**JOINT STIPULATION TO
CONTINUE DEADLINE FOR
NOTICE TO CLASS FOR 14 DAYS
TO ALLOW FOR COMPLETION OF
SETTLEMENT AGREEMENT;
DECLARATION OF PETER
KENNEDY IN SUPPORT
THEREOF; AND [PROPOSED]
ORDER**

L.R. 6-2

Honorable William H. Alsup

25 Case No. 3:15-cv-02904-WHA
26
27
28

STIPULATION

Plaintiff Latasha McLaughlin and Defendant Wells Fargo Bank, N.A., by and through their respective counsel, stipulate as follows:

WHEREAS, on August 29, 2016, this Court issued an order [Dkt. # 140] approving the parties' joint plan [Dkt. #139] for providing notice to the class of the Court's certification order [Dkt # 132]. This plan called for the notice to be sent within 16 days of the Court's order, which creates a mailing deadline of September 14, 2016. The plan also called for the class list to be provided to the administrator by September 1, 2016. *Id.*

WHEREAS, thanks to the efforts of Magistrate Judge Donna M. Ryu, the parties have made significant progress toward the resolution of the matter, and a draft comprehensive class settlement agreement has been circulated. Kennedy Declaration, at Para. 2.

WHEREAS, to avoid the cost of the Class Administrator and the needless printing and mailing of the notice, estimated to be nearly \$20,000, the parties agree and respectfully request that the deadline for mailing the notice be continued two weeks to September 28, 2016. The parties anticipate that this two week continuance will be sufficient for them to complete the settlement agreement, advise the Court of the settlement, and request that the current trial and notice dates be vacated to allow for a motion for preliminary approval to be filed and heard. For the same reasons, the parties' request the deadline to provide the class list to the Class Administrator also be moved to September 21, 2016.

WHEREAS, the parties' request will not otherwise alter the schedule in the case.

THEREFORE, Plaintiff and Wells Fargo hereby agree to extend:

1. The deadline for Wells Fargo to provide the class list to the Class Administrator from September 1, 2016 to September 21, 2016.

2. The deadline for mailing the class notice from September 14, 2016 to September 28, 2016.

DATED: September 1, 2016

WOLF POPPER LLP

By: /s/ Patricia Avery

Patricia I. Avery (*pro hac vice*)
Matthew Insley-Pruitt (*pro hac vice*)
Counsel for Plaintiff and the Class

BERMAN DEVALERIO

Joseph J. Tabacco, Jr.
Kristin J. Moody
Local Counsel for Plaintiff and the Class

DATED: September 1, 2016

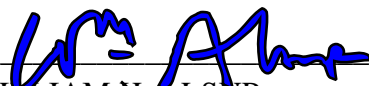
REED SMITH LLP

By: /s/ Ashley Shively

Ashley L. Shively
Attorneys for Defendant
Wells Fargo Bank, N.A.

PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS SO ORDERED.

Dated September 1, 2016


WILLIAM H. ALSUP
UNITED STATES DISTRICT JUDGE

REED SMITH LLP
A limited liability partnership formed in the State of Delaware